

## MEMORANDUM

January 8, 2008

TO: Phil Alperson, Montgomery County BRAC Coordinator  
Office of the County Executive

FROM: Arthur Holmes, Jr., Director  
Department of Public Works and Transportation

SUBJECT: Comments on the DEIS for Activities to Implement 2005 BRAC  
At the NNMC in Bethesda, Maryland

The Montgomery County Department of Public Works and Transportation (DPWT) has completed its review of the Draft Environmental Impact Statement (DEIS) for Activities to Implement 2005 Base Realignment and Closure Actions (BRAC) at the National Naval Medical Center (NNMC) in Bethesda, released in December 2007. The DEIS appears to be generally complete, correct, and internally consistent. The associated Traffic Study is consistent with the methodology of the Local Area Transportation Review (LATR) Guidelines as established by Maryland-National Capital Park and Planning Commission. No fatal flaws have been identified. However, DPWT offers several comments that address specific concerns below and will provide detailed editorial comments separately.

As a BRAC action, it must be accomplished on or before September 15, 2011, and the No Action Alternative is not a viable alternative for consideration, but merely serves as a benchmark to evaluate the two action alternatives. It is assumed, that one of the two action alternatives will be implemented. Of the two action alternatives, there is no significant difference between them on the basis of transportation policy factors because there is no difference in development with either option. However, from a solid waste perspective there is a benefit derived by Alternative 1 with renovation preferred over tearing down and replacing existing buildings with new construction.

DPWT supports the roadway and intersection improvements identified as potential traffic improvements in the DEIS, which include, all of the internal traffic improvements to entrance gates, perimeter road and the truck inspection stations as well as those off-site improvements that mitigate traffic impacts. Traffic impact improvements include improvements to Rockville Pike and Cedar Lane, Old Georgetown and Cedar Lane, Rockville Pike and Jones Bridge, Connecticut and Jones Bridge, and the development of a Transportation Management Plan. In addition, the DPWT recommends the MD 355 Corridor Study (though not specifically mentioned in the DEIS) be placed on a fast track as with the associated intersection improvements.

DPWT recommends that the pedestrian connection between the Medical Center Metrorail Station and the NNMC be built as either a tunnel or an overpass crossing Rockville Pike. This pedestrian improvement is needed prior to the opening of the NNMC facilities in 2011. As discussed below, this improvement will facilitate non-auto mode choices and improve pedestrian safety.

The grade separation at MD 355 and Cedar Lane is in the Master Plan. The Maryland State Highway Administration (MSHA) should include and evaluate this project in the MD 355 Corridor Study. In addition, MSHA should conduct an evaluation of the feasibility and benefit derived by providing slip ramps from I-495 directly into the NNMC property but only as a long-term improvement. In providing any additional road improvements, it is important to ensure that facilitating vehicular traffic flow is not accomplished at the expense of transit and pedestrian/bike friendly measures.

Congestion is likely to increase without substantial numbers of trips being accommodated by non-auto mode use. A major component of both short and long-term solutions must be provisions for alternative modes of travel, both to preserve the effectiveness of the road improvements to be made, and to enable growth in alternative mode use over time. In addition to the very important pedestrian connection mentioned above, DPWT supports a variety of other measures to facilitate non-auto mode choices and improve pedestrian safety. The DEIS suggests such pedestrian improvements to enhance the safety and compliance with the Americans with Disabilities Act (ADA) as well as to enhance the overall pedestrian environment. Pedestrian and bicyclist safety is a major priority of Montgomery County and DPWT is currently addressing many of the concerns identified in the document, and will continue to do so, through its Pedestrian Safety Program, Bethesda CBD Streetscape Project, Bethesda Bikeway and Pedestrian Facilities Project, the Annual Sidewalk and Annual Bikeway Programs, Sidewalk and Infrastructure Revitalization Program. In addition, Countdown Signals are being installed as part of the County Executive's Pedestrian Safety Initiative and installed any time signals are modified. The DEIS should reflect the County's current effort in pedestrian safety improvements.

In order to mitigate on-site parking problems and to support non-auto travel, the Navy should commit to expand their Shuttle Bus Service to include shuttling employees and visitors between off-site transit centers and park-and-ride facilities and the base. Shuttle bus service, if implemented during the construction stage, would also serve to mitigate the impact of construction traffic on the surrounding network. It is imperative that the final Environmental Impact Statement (EIS) include a plan for managing construction traffic with specific requirements as to how this traffic will be managed and directed away from the surrounding neighborhoods.

The Traffic Study is required to use 2011 as its target year. This target year may be acceptable for the future year analysis of the EIS, but fails to reflect the transportation impacts of the BRAC development on the build out network that include the Purple Line, and the Corridor Cities Transitway (CCT), the I-270 highway improvements, and the InterCounty

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Connector (ICC). The Traffic Study does not accurately or completely describe the existing use of the Red Line Medical Center Station. Metrorail survey information is available and would be useful in forecasting trip generation and distribution. Transit data is also available for the Purple Line, and the CCT. While the use of this data would not significantly change the recommendations of the DEIS, it would be a beneficial resource in the development of the Transportation Management Plan (TMP) and must be considered during that process. A TMP must be completed and must incorporate specific programs, a clear set of goals, and the implementation of specific strategies.

Finally, it is important to note that as a BRAC action there are many impacts of this federally imposed "unfunded mandate" on state and local facilities. With no direct federal funding in the project to offset the costs of those impacts, the state and local governments must bear an added financial burden of "up-front costs" to support the federal action. Particularly from a transportation stand point, the BRAC action should be adequately funded by the federal government and Department of Defense to provide direct funding for the identified off-site traffic improvements.

AH:lh

Attachment